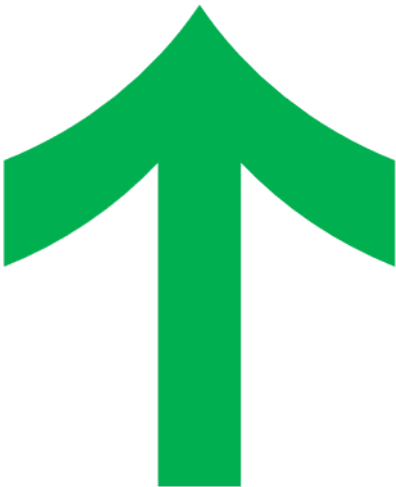


Associated Banc-Corp

Environmental Risk Management Policy & Program Statement

2024



Here for the environment

As a corporation, Associated Banc-Corp (“Associated” or “the Company”) has a strong focus on promoting responsible and sustainable business practices that align with our business strategies; position us to be more efficient and resilient; improve the health, well-being and engagement of our colleagues; and help keep our communities and our environment vibrant and healthy.

Our Environmental Sustainability Risk Management Policy and Program (“Program”) are designed to help guide business practices that appropriately define, prioritize, measure and manage environmental sustainability initiatives related to environmental risk management; our internal operations; products and services; community commitments, procurement sourcing; customers, colleagues and other stakeholders.

Program Approach

The following principles form the foundation of our approach:

Environmental Risk Management	Environmental Focus on Efficient Energy and Resource Use	Environmental Sustainability Transition
We implemented an Environmental Management System to be integrated into the company’s Enterprise Risk Management Program.	We pursue environmental sustainability initiatives focused on managing the company’s impact on climate change, carbon emissions & natural resources.	We implement and uphold policies, programs and lending practices that help our customers, colleagues and communities transition to a more environmentally sustainable future.

Associated reviews its Program and performance on ongoing basis. Our goal is to take a “continuous improvement” approach to the Program’s evolution, with consideration to both environmental sustainability and our responsibility for the performance of the Company. Ultimately, we believe integrating both business and sustainability priorities is the best approach for all our stakeholders.

Program Governance

The Associated Board of Directors (the “Board”) through the Enterprise Risk Committee of the Board of Directors (ERC) is the approval authority for the Environmental Sustainability Risk Policy. The policy will be reviewed and approved on a periodic basis.

The ERC has delegated to Corporate senior management responsibility for managing Environmental Sustainability Risk and developing an Environmental Sustainability Risk Management Program. Corporate senior management will carry out this mandate through the Enterprise Risk Management Committee (“ERMC”).

The Company’s Sustainability Committee, which includes cross-organizational representatives, helps to identify, implement and effectuate priorities for ASB’s Environmental Sustainability activities. In addition, the Company’s property and project management responsibilities are managed by Coldwell Banker Richard Ellis (CBRE), an industry leader in developing best practices and programs to further reduce environmental impact.

In addition, all company colleagues are responsible for compliance with the company’s Environmental Risk Management Policy.

Public Disclosure

Our environmental sustainability reporting is aligned with our business objectives. We have continued to use the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) – recently incorporated into

International Sustainability Standards Board's (ISSB). Reporting will be available through the Company's Sustainability Report.